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July 8, 2020

VIA EMAIL ONLY

Theodore B. Randles
Venable LLP
600 Massachusetts Avenue, NW
Washington, DC 20001

Re: *Estate of Guinnane, et al. v. Estate of Dobbins, et al.*
Meet & Confer regarding Rule 30(b)(6) Depositions
Confirmation re: Financial Information

Mr. Randles:

I received your letter this morning objecting to Plaintiffs' topics for tomorrow's Rule 30(b)(6) depositions of EAN Holdings, LLC and Enterprise RAC Company of Montana/Wyoming, LLC. It is unfortunate you waited until today, the day prior to the deposition, to raise these objections despite having the deposition topics in your possession since April 23, 2020. I am confident we could have worked through your concerns had you raised your objections sooner.

Given the very limited amount of time available between receiving your objections this morning and tomorrow's depositions, I need to determine whether it will be worthwhile to continue with the depositions. To that end, please advise by 3:00 p.m. (Mountain) whether EAN and RAC intend to allow their designee to answer questions on topics that you objected to and, if so, whether the deponent will be prepared to testify on those topics. If either response is no, then I propose we cancel the depositions and raise these issues with the Court.

Regarding RAC's production of its balance sheet, I have previously confirmed and will reiterate that any such information is subject to our protective order agreement and will only be used for purposes of pursuing Plaintiffs' punitive damage claim consistent with Montana law.



Theodore B. Randles

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Sincerely,

GOETZ, BALDWIN & GEDDES, P.C.

A handwritten signature in blue ink, appearing to read "J. Devlan Geddes". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. Devlan Geddes

cc: Randy Colbert
Patrick M. Sullivan